



October 30, 2023

Via ECF and E-mail

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007

**Re: *In re Tether and Bitfinex Crypto Asset Litigation*, 19-CV-09236 (KPF) –
Letter Motion to File Redline Exhibit Under Seal**

Dear Judge Failla,

We represent Plaintiffs in the above-referenced action. Pursuant to Rule 9 of this Court's Individual Rules of Practice in Civil Cases, Plaintiffs request permission to file the redline, per the Court's Order dated October 27, 2023 (ECF No. 484), attached as Exhibit A to Plaintiffs' Letter dated October 30, 2023, under seal.

Plaintiffs' proposed Second Amended Consolidated Complaint filed at ECF No. 480-1 (the "SAC") contains information that has been designated as Confidential or Attorneys' Eyes Only by Defendants pursuant to this Court's Protective Order. ECF No. 151, at ¶ 3. The SAC also contains information concerning the Anonymous Trader, such information is Attorney's Eyes Only subject to the Court's November 22, 2021 Order. ECF No. 195. With respect to information designated Confidential or Attorneys' Eyes Only by Defendants, Plaintiffs take no position as to Defendants' characterization of that information as Confidential or Attorneys' Eyes Only for the limited purposes of this filing.

Hon. Katherine Polk Failla
October 30, 2023

Respectfully submitted,

/s/ Andrew R. Dunlap

Philippe Z. Selendy
Andrew R. Dunlap
Oscar Shine
SELENDY GAY ELSBERG PLLC
1290 Sixth Avenue
New York, NY 10104
pselendy@selendygay.com
adunlap@selendygay.com
oshine@selendygay.com

/s/ Todd M. Schneider

Todd M. Schneider (*pro hac vice*)
Matthew S. Weiler (*pro hac vice*)
Mahzad K. Hite (*pro hac vice*)
SCHNEIDER WALLACE COTTRELL
KONECKY LLP
2000 Powell Street, Suite 1400
Emeryville, CA 94608
tschneider@schneiderwallace.com
mweiler@schneiderwallace.com
mhite@schneiderwallace.com

*Interim Lead Counsel and Attorneys for
Plaintiffs and the Proposed Class*

cc: All Counsel of Record (via ECF)